

**ORIGINAL**

DEC 18 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JAMES N. HATTEN, Clerk

By: 

UNITED STATES OF AMERICA

v.

BENJAMIN IBUKUNOLUWA OYE

TYLER KEON ROUSSELL

CHRISTOPHER AKINWANDE AWONUGA

CASEY BRODERICK WILLIAMS

CHADWICK OSBOURNE STEWART

SETH APPIAH KUBI

Criminal Indictment

No. **1:18-CR-491**

**UNDER SEAL**

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

**(Conspiracy to Commit Bank Fraud)**

**(18 U.S.C. § 1349)**

1. Beginning on a date unknown to the grand jury, but from at least in or about October 2016, and continuing through at least in or about October 2018, in the Northern District of Georgia, and elsewhere, Defendants

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL**

**CHRISTOPHER AKINWANDE AWONUGA**

**CASEY BRODERICK WILLIAMS and**

**CHADWICK OSBOURNE STEWART**

did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with one another, and with others known and unknown to the grand jury, to commit certain offenses against the United States, that is, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud SunTrust Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, certain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of the aforementioned financial institutions, in violation of Title 18, United States Code, Section 1344.

#### Parties Involved

At all times relevant to the Indictment:

2. SunTrust Bank was the largest subsidiary of SunTrust Banks, Inc., an American bank holding company. SunTrust Bank was headquartered in Atlanta, Georgia, but had branches throughout the eastern half of the United States.

3. The Defendants lived in and operated the bank fraud scheme in and around Atlanta, Georgia, in the Northern District of Georgia.

4. Individual victims A.K. and A.K. were a married couple that held a joint business account with SunTrust.

The Scheme and Artifice to Defraud

At all times relevant to the Indictment:

5. Defendants BENJAMIN IBUKUNOLUWA OYE ("OYE"), TYLER KEON ROUSSELL ("ROUSSELL"), CHRISTOPHER AKINWANDE AWONUGA ("AWONUGA"), CASEY BRODERICK WILLIAMS ("WILLIAMS"), and CHADWICK OSBOURNE STEWART ("STEWART"), along with others known and unknown to the grand jury, conspired to defraud SunTrust Bank.

6. From on or about June 19, 2017, to on or about February 14, 2018, Defendant OYE was employed as a floating bank teller at SunTrust Bank in the Atlanta metro area.

7. In or about October 2017, OYE started recording SunTrust business credit card information, by cell phone photograph and text message, in order to provide the confidential information to outside parties. The outside parties would then redeem rewards points associated with the misappropriated business credit card accounts, and would pay OYE a percentage of the value of the redeemed points.

8. OYE later took advantage of his access to confidential SunTrust customer records, including personal identifiers, account numbers, and transaction history, to defraud SunTrust and its customers. While OYE assisted SunTrust customers with bank transactions, OYE would record confidential customer information using his personal cell phone, and would retain and later use that information to defraud and steal from SunTrust and its customers.

9. The confidential information that OYE retained and later used included, among other things, customers' names, driver's license numbers, and account numbers. Using this confidential customer information, OYE could conduct fraudulent bank transactions, including bank account withdrawals, without a customer present in the bank.

10. OYE also utilized the help of co-conspirators, including Defendants ROUSSELL, AWONUGA, WILLIAMS, and STEWART, to impersonate customers and conduct fraudulent bank transactions using the misappropriated customer data. After completing the fraudulent bank transactions, OYE would share the proceeds of the fraud with his co-conspirators. OYE and Defendants ROUSSELL, AWONUGA, WILLIAMS, and STEWART also caused the illegally obtained funds to be laundered through financial transactions intended to conceal the illicit source of those funds:

***Individual Victims A.K. and A.K.***

11. On or about November 16, 2017, while Defendant OYE was working as a SunTrust teller, OYE assisted female SunTrust customer A.K. with a counter transaction at a SunTrust Bank branch in the Northern District of Georgia. After her transaction was complete and A.K. departed the branch, OYE accessed A.K.'s SunTrust business account, ending 6336, on the SunTrust network for no legitimate business purpose. OYE then retained A.K.'s confidential account information by taking cell phone pictures of A.K.'s account information and by typing information into OYE's personal cell phone.

12. A.K.'s SunTrust account was shared with her husband, A.K. OYE again accessed A.K.'s joint account on two other occasions, on or about November 22 and 25, 2017, for no legitimate business purpose, and without either accountholder present in the bank branch at the time.

13. In or about May 2018, OYE and Defendants ROUSSELL, AWONUGA, WILLIAMS, and STEWART used the confidential information of A.K. and A.K. to effectuate multiple fraudulent withdrawals from their joint SunTrust account.

14. On or about May 10, 2018, at a SunTrust branch in the Northern District of Georgia, STEWART conducted an over-the-counter transaction and purchased three \$20,000 cashier's checks from the business checking account of A.K. and A.K., ending 6336: (1) official check no. 5532073543 made payable to CHADWICK STEWART in the amount of \$20,000; (2) official check no. 5532073544 made payable to TYLER ROUSSELL in the amount of \$20,000; and (3) official check no. 5532073546 made payable to CHRISTOPHER AWONUGA in the amount of \$20,000. During these withdrawals, STEWART unlawfully used the name, Georgia driver's license number, and other personally identifiable information ("PII") of male victim A.K., without his consent, in order to conduct the fraudulent withdrawals.

15. On or about May 11, 2018, STEWART went to a SunTrust Bank branch in East Point, in the Northern District of Georgia, and converted into cash the \$20,000 cashier's check fraudulently obtained from A.K. and A.K.'s account, official check no. 5532073543, dated May 10, 2018, made payable to STEWART.

16. On or about May 11, 2018, ROUSSELL and OYE went to a SunTrust Bank branch in Smyrna, in the Northern District of Georgia, and converted into cash the \$20,000 cashier's check fraudulently obtained from A.K. and A.K.'s account, official check no. 5532073544, dated May 10, 2018, made payable to ROUSSELL.

17. On or about May 11, 2018, AWONUGA went to a SunTrust Bank branch in Smyrna, in the Northern District of Georgia, and converted into cash the \$20,000 cashier's check fraudulently obtained from A.K. and A.K.'s account, official check no. 5532073546, dated May 10, 2018, made payable to AWONUGA.

18. On or about May 30, 2018, at a SunTrust branch in the Northern District of Georgia, WILLIAMS conducted an over-the-counter transaction and purchased three \$20,000 cashier's checks from the business checking account of A.K. and A.K., ending 6336: (1) official check no. 5531088886 made payable to CASEY WILLIAMS in the amount of \$20,000; (2) official check no. 5531088887 made payable to TYLER ROUSSELL in the amount of \$20,000; and (3) official check no. 5531088889 made payable to CHRISTOPHER AWONUGA in the amount of \$20,000. During these withdrawals, WILLIAMS unlawfully used the name, Georgia driver's license number, and other PII of male victim A.K., without his consent, in order to conduct the withdrawals.

19. Later, on or about May 30, 2018, ROUSSELL went to a SunTrust Bank branch in Smyrna, in the Northern District of Georgia, and converted into cash the \$20,000 cashier's check fraudulently obtained from A.K. and A.K.'s account, official check no. 5531088887, dated May 30, 2018, made payable to ROUSSELL.

20. On or about June 2, 2018, WILLIAMS went to a SunTrust Bank branch in Smyrna, in the Northern District of Georgia, and converted into cash the \$20,000 cashier's check fraudulently obtained from A.K. and A.K.'s account, official check no. 553108886, dated May 30, 2018, made payable to WILLIAMS.

21. On or about June 4, 2018, AWONUGA went to a SunTrust Bank branch in Sandy Springs, in the Northern District of Georgia, and converted into cash the \$20,000 cashier's check fraudulently obtained from A.K. and A.K.'s account, official check no. 553108889, dated May 30, 2018, made payable to AWONUGA.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS TWO THROUGH FOUR**

**(Bank Fraud)**

**(18 U.S.C. § 1344)**

22. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 2 through 4 and 6 through 21 of this Indictment as if fully set forth herein.

23. Beginning on a date unknown to the Grand Jury, but from at least on or about May 10, 2018, and continuing through at least on or about May 10, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**CHADWICK OSBOURNE STEWART**

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL and**

**CHRISTOPHER AKINWANDE AWONUGA**

aided and abetted by one another, and by others known and unknown to the grand jury, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud SunTrust Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, certain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of the aforementioned financial institution.

24. As part of the scheme to defraud, STEWART, aided and abetted by OYE, falsely represented to SunTrust that he was authorized to withdraw funds from the business checking account of A.K., ending 6366, when in fact he was not.

25. In furtherance of the scheme to defraud, STEWART, aided and abetted by OYE, unlawfully used the name and Georgia driver's license number of victim A.K., without his knowledge and consent, in order to conduct fraudulent withdrawals of funds from A.K.'s account.

26. As a part of the scheme to defraud, STEWART, aided and abetted by OYE, ROUSSELL, and AWONUGA, fraudulently purchased three cashier's checks from the business checking account of A.K., as described in the table below:



Count	Date (on or about)	Transaction Type	Source Account	Check Payable To	Amount
2	May 10, 2018	Purchase of cashier's check #5532073543	A.K. SunTrust account ending 6366	CHADWICK STEWART	\$20,000
3	May 10, 2018	Purchase of cashier's check #5532073544	A.K. SunTrust account ending 6366	TYLER ROUSSELL	\$20,000
4	May 10, 2018	Purchase of cashier's check #5532073546	A.K. SunTrust account ending 6366	CHRISTOPHER AWONUGA	\$20,000

All in violation of Title 18, United States Code, Section 1344 and Section 2.

**COUNTS FIVE THROUGH SEVEN**  
**(Aggravated Identity Theft)**  
**(18 U.S.C. § 1028A)**

27. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 2 through 4 and 6 through 21 of this Indictment as if fully set forth herein.

28. On or about May 10, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**CHADWICK OSBOURNE STEWART**

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL and**

**CHRISTOPHER AKINWANDE AWONUGA**

aided and abetted by one another, and by others known and unknown to the grand jury, did knowingly possess and use, without lawful authority, a means of

identification of another person, to wit, A.K., during and in relation to committing the felony violation of bank fraud, as alleged in Counts Two through Four of this Indictment, for the bank transactions described in the table below:

Count	Date (on or about)	Transaction Type	Source Account	Check Payable To	Amount
5	May 10, 2018	Purchase of cashier's check #5532073543	A.K. SunTrust account ending 6366	CHADWICK STEWART	\$20,000
6	May 10, 2018	Purchase of cashier's check #5532073544	A.K. SunTrust account ending 6366	TYLER ROUSSELL	\$20,000
7	May 10, 2018	Purchase of cashier's check #5532073546	A.K. SunTrust account ending 6366	CHRISTOPHER AWONUGA	\$20,000

All in violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

**COUNTS EIGHT THROUGH TEN**  
**(Money Laundering)**  
**(18 U.S.C. § 1957)**

29. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 2 through 4 and 6 through 21 of this Indictment as if fully set forth herein.

30. On or about the dates listed in the table below, in the Northern District of Georgia, and elsewhere, the Defendants listed in the table below, aided and abetted by one another, and by others known and unknown to the Grand Jury, did knowingly engage and attempt to engage in a monetary

transaction by, through, and to a financial institution, affecting interstate and foreign commerce, knowing that such transaction involved criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, by causing a fraudulently obtained cashier's check to be cashed, as described in the table below:

Count	Date (on or about)	Defendants Charged in Count	Transaction Type	Source Account	Amount
8	May 11, 2018	<b>CHADWICK OSBOURNE STEWART and BENJAMIN IBUKUNOLUWA OYE</b>	Cashing cashier's check #5532073543 payable to CHADWICK STEWART	A.K. SunTrust account ending 6366	\$20,000
9	May 11, 2018	<b>TYLER KEON ROUSSELL and BENJAMIN IBUKUNOLUWA OYE</b>	Cashing cashier's check #5532073544 payable to TYLER ROUSSELL	A.K. SunTrust account ending 6366	\$20,000
10	May 11, 2018	<b>CHRISTOPHER AKINWANDE AWONUGA and BENJAMIN IBUKUNOLUWA OYE</b>	Cashing of cashier's check #5532073546 payable to CHRISTOPHER AWONUGA	A.K. SunTrust account ending 6366	\$20,000

All in violation of Title 18, United States Code, Section 1957 and Section 2.

**COUNTS ELEVEN THROUGH THIRTEEN**

**(Bank Fraud)**

**(18 U.S.C. § 1344)**

31. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 2 through 4 and 6 through 21 of this Indictment as if fully set forth herein.

32. Beginning on a date unknown to the Grand Jury, but from at least on or about May 30, 2018, and continuing through at least on or about May 30, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**CASEY BRODERICK WILLIAMS**

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL and**

**CHRISTOPHER AKINWANDE AWONUGA**

aided and abetted by one another, and by others known and unknown to the grand jury, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud SunTrust Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, certain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of the aforementioned financial institution.

33. As part of the scheme to defraud, WILLIAMS, aided and abetted by OYE, falsely represented to SunTrust that he was authorized to withdraw funds from the business checking account of A.K., ending 6366, when in fact he was not.

34. In furtherance of the scheme to defraud, WILLIAMS, aided and abetted by OYE, unlawfully used the name and Georgia driver's license number of victim A.K., without his knowledge and consent, in order to conduct fraudulent withdrawal of funds from A.K.'s account.

35. As a part of the scheme to defraud, WILLIAMS, aided and abetted by OYE, ROUSSELL, and AWONUGA, fraudulently purchased three cashier's checks from the business checking account of A.K., as described in the table below:

Count	Date (on or about)	Transaction Type	Source Account	Check Payable To	Amount
11	May 30, 2018	Purchase of cashier's check #5531088886	A.K. SunTrust account ending 6366	CASEY WILLIAMS	\$20,000
12	May 30, 2018	Purchase of cashier's check #5531088887	A.K. SunTrust account ending 6366	TYLER ROUSSELL	\$20,000
13	May 30, 2018	Purchase of cashier's check #5531088889	A.K. SunTrust account ending 6366	CHRISTOPHER AWONUGA	\$20,000

All in violation of Title 18, United States Code, Section 1344 and Section 2.

**COUNTS FOURTEEN THROUGH SIXTEEN**

**(Aggravated Identity Theft)**

**(18 U.S.C. § 1028A)**

36. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 2 through 4 and 6 through 21 of this Indictment as if fully set forth herein.

37. On or about May 30, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**CASEY BRODERICK WILLIAMS**

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL and**

**CHRISTOPHER AKINWANDE AWONUGA**

aided and abetted by one another, and by others known and unknown to the grand jury, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, A.K., during and in relation to committing the felony violation of bank fraud, as alleged in Counts Eleven through Thirteen of this Indictment, for the bank transactions described in the table below:

<b>Count</b>	<b>Date (on or about)</b>	<b>Transaction Type</b>	<b>Source Account</b>	<b>Check Payable To</b>	<b>Amount</b>
14	May 30, 2018	Purchase of cashier's check #5531088886	A.K. SunTrust account ending 6366	CASEY WILLIAMS	\$20,000
15	May 30, 2018	Purchase of cashier's check #5531088887	A.K. SunTrust account ending 6366	TYLER ROUSSELL	\$20,000
16	May 30, 2018	Purchase of cashier's check #5531088889	A.K. SunTrust account ending 6366	CHRISTOPHER AWONUGA	\$20,000

All in violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

**COUNTS SEVENTEEN THROUGH NINETEEN**

**(Money Laundering)**

**(18 U.S.C. § 1957)**

38. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 2 through 4 and 6 through 21 of this Indictment as if fully set forth herein.

39. On or about the dates listed in the table below, in the Northern District of Georgia, and elsewhere, the Defendants listed in the table below, aided and abetted by one another, and by others known and unknown to the Grand Jury, did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, knowing that such transaction involved criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, by causing a fraudulently obtained cashier's check to be cashed, as described in the table below:



Count	Date (on or about)	Defendants Charged in Count	Transaction Type	Source Account	Amount
17	May 30, 2018	<b>TYLER KEON ROUSSELL and BENJAMIN IBUKUNOLUWA OYE</b>	Cashing cashier's check #5531088887 payable to TYLER ROUSSELL	A.K. SunTrust account ending 6366	\$20,000
18	June 2, 2018	<b>CASEY BRODERICK WILLIAMS and BENJAMIN IBUKUNOLUWA OYE</b>	Cashing cashier's check #5531088886 payable to CASEY WILLIAMS	A.K. SunTrust account ending 6366	\$20,000
19	June 4, 2018	<b>CHRISTOPHER AKINWANDE AWONUGA and BENJAMIN IBUKUNOLUWA OYE</b>	Cashing of cashier's check #5531088889 payable to CHRISTOPHER AWONUGA	A.K. SunTrust account ending 6366	\$20,000

All in violation of Title 18, United States Code, Section 1957 and Section 2.

**COUNT TWENTY**  
**(Conspiracy to Commit Bank Fraud)**  
**(18 U.S.C. § 1349)**

40. Beginning on a date unknown to the grand jury, but from at least on or about September 26, 2018, and continuing through at least on or about September 26, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**BENJAMIN IBUKUNOLUWA OYE and**  
**SETH APPIAH KUBI**



did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with one another, and with others known and unknown to the grand jury, to commit certain offenses against the United States, that is, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud Bank of America, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, certain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of the aforementioned financial institution, in violation of Title 18, United States Code, Section 1344.

#### Parties Involved

At all times relevant to the Indictment:

41. The Bank of America Corp. was an American multinational investment bank and financial services company based in Charlotte, North Carolina, with central hubs in New York City, London, Hong Kong, and Toronto, and with bank branches throughout the United States.

42. The Defendants lived in and operated the bank fraud scheme in and around Atlanta, Georgia, in the Northern District of Georgia.

43. Individual victim R.T. held a line of credit with Bank of America.

The Scheme and Artifice to Defraud

At all times relevant to the Indictment:

44. Defendants OYE and SETH APPIAH KUBI (“KUBI”), along with others known and unknown to the grand jury, conspired to defraud Bank of America.

45. On or about September 26, 2018, Defendants OYE and SETH APPIAH KUBI (“KUBI”) traveled together to a Bank of America branch in Sandy Springs, in the Northern District of Georgia, in order to conduct a fraudulent bank transfer using stolen identifying information of a Bank of America customer, R.T., a man living in Illinois.

***Individual Victim R.T.***

46. On or about September 26, 2018, KUBI attempted to conduct a \$250,000 over-the-counter wire transfer, from a Bank of America line of credit in the name of R.T., to a Bank of America business account controlled by the conspirators. KUBI presented himself to be R.T. by using R.T.’s PII.

47. In the course of requesting the \$250,000 wire transfer, KUBI presented a fraudulent driver’s license for R.T. that contained KUBI’s photograph, but which also contained actual PII of R.T., including R.T.’s actual date of birth, license number, and home address.

48. KUBI was also in possession of counterfeit debit cards in the name of R.T. for business accounts with Bank of America and BB&T Bank. KUBI was also in possession of a piece of paper containing the actual Social Security number for R.T.

49. Before completing the requested wire transfer, the Bank of America employee assisting KUBI made contact with the real R.T. who confirmed that KUBI was an imposter. The Bank of America employee rejected the requested wire transfer and called law enforcement.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWENTY-ONE**  
**(Attempted Bank Fraud)**  
**(18 U.S.C. § 1344)**

50. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 41 through 43 and 45 through 49 of this Indictment as if fully set forth herein.

51. On or about September 26, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**SETH APPIAH KUBI and**  
**BENJAMIN IBUKUNOLUWA OYE**

aided and abetted by one another, and by others known and unknown to the grand jury, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud Bank of America, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain and attempt to obtain, by means of materially false and fraudulent pretenses, representations, and promises, certain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of the aforementioned financial institution.

52. As a part of the scheme to defraud, KUBI, aided and abetted by OYE, attempted to conduct a \$250,000 wire transfer, from a Bank of America line of credit belonging to R.T., to a Bank of America business account controlled by conspirators of KUBI and OYE.

53. As part of the scheme to defraud, KUBI, aided and abetted by OYE, falsely represented to Bank of America that he was in fact R.T., and that he was thus authorized to access funds from R.T.'s line of credit, when in fact he was not.

54. In furtherance of the scheme to defraud, KUBI, aided and abetted by OYE, unlawfully used the name, date of birth, Illinois driver's license number, and home address of R.T., without his knowledge or consent, in order to attempt to conduct the fraudulent transfer of funds from R.T.'s line of credit.

All in violation of Title 18, United States Code, Sections 1344 and 1349 and Section 2.

**COUNT TWENTY-TWO**  
**(Aggravated Identity Theft)**  
**(18 U.S.C. § 1028A)**

55. The Grand Jury re-alleges and incorporates by reference the factual allegations laid out in Paragraphs 41 through 43 and 45 through 49 of this Indictment as if fully set forth herein.

56. On or about September 26, 2018, in the Northern District of Georgia, and elsewhere, Defendants

**SETH APPIAH KUBI and**  
**BENJAMIN IBUKUNOLUWA OYE**

aided and abetted by one another, and by others known and unknown to the grand jury, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, R.T., during and in relation to committing the felony violation of attempted bank fraud, as alleged in Count Twenty-One of this Indictment.

All in violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

FORFEITURE PROVISION

57. Upon conviction of Counts One through Four, Eleven through Thirteen, and Twenty through Twenty-One (bank fraud counts) of this Indictment, defendants

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL**

**CHRISTOPHER AKINWANDE AWONUGA**

**CASEY BRODERICK WILLIAMS**

**CHADWICK OSBOURNE STEWART and**

**SETH APPIAH KUBI**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violations. The property to be forfeited includes, but is not limited to, the following:

**MONEY JUDGMENT:** A sum of money in United States currency, representing the amount of proceeds obtained as a

result of the offenses alleged in Counts One through Four, Eleven through Thirteen, and Twenty through Twenty-One (bank fraud counts) of this Indictment.

58. In addition, upon conviction of Counts Eight through Ten, and Seventeen through Nineteen (money laundering counts) of this Indictment, defendants

**BENJAMIN IBUKUNOLUWA OYE**

**TYLER KEON ROUSSELL**

**CHRISTOPHER AKINWANDE AWONUGA**

**CASEY BRODERICK WILLIAMS and**

**CHADWICK OSBOURNE STEWART**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, or property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

**MONEY JUDGMENT:** A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Counts Eight through Ten, and Seventeen through Nineteen (money laundering counts) of this Indictment.

59. If any of the property described above, as a result of any act or omission of a defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A True Bill BILL  
AMNORTE  
FOREPERSON

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